WDM/SES: USAO 2011R00760

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	*	
	*	
v.	*	**CRIMINAL NO. AW-12-075**
	*	
RAMON MIGUEL CERROS-CRUZ,	*	**(Conspiracy to Interfere with Interstate**
a/k/a Ramon Miguel Cerros,	*	**Commerce by Robbery, 18 U.S.C.**
a/k/a Ramon Miguel Cerras,	*	**§ 1951(a); Interference with Interstate**
a/k/a Miguel Ramon Cerras-Cruz,	*	**Commerce by Robbery, 18 U.S.C.**
	*	**§ 1951(a); Aiding and Abetting,**
Defendant	*	**18 U.S.C. § 2)**
	*	
	*	

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SUPERSEDING INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that:

Introduction

1.   At all times material to this Indictment, the apartment located at 7903

14th Avenue, Apartment #102, Hyattsville, Maryland ("the brothel apartment") was used as a

brothel where male customers would pay to have sexual relations with female prostitutes. In

addition to the prostitutes who did business at the brothel apartment, male "door men" guarded

the premises. The business of the brothel apartment was in and affecting interstate commerce in

numerous ways, including but not limited to the fact that prostitutes were recruited from outside

of Maryland, traveled to and from locations outside of Maryland for the purpose of working at

the brothel apartment, and used goods that were manufactured outside of Maryland and shipped

across state lines.

The Conspiracy

2.   On or about February 28, 2007, in the District of Maryland and elsewhere, the

defendant,

RAMON MIGUEL CERROS-CRUZ,
a/k/a Ramon Miguel Cerros,
a/k/a Ramon Miguel Cerras,
a/k/a Miguel Ramon Cerras-Cruz,

did knowingly and willfully combine, conspire, confederate, and agree with others known and

unknown to the Grand Jury to obstruct, delay, and affect commerce and the movement of an

article and commodity in commerce by robbery, as that term is defined in Title 18, United States

Code, Section 1951(b)(1), by the unlawful taking of business proceeds, money, and personal

property from the person and presence of persons working and present at the brothel apartment,

against their will, and by means of actual and threatened force, violence, and fear of injury,

immediate and future, to such persons by threatening physical injury and death to them.

Ways, Manner and Means of the Conspiracy

3.   Among the manner and means used by the Defendant and coconspirators to

achieve the objects of the conspiracy, were the following:

a.   It was part of the conspiracy that defendant **RAMON MIGUEL**

CERROS-CRUZ, a/k/a Ramon Miguel Cerros, a/k/a Ramon Miguel Cerras, a/k/a Miguel

Ramon Cerras-Cruz ("CERROS-CRUZ") and coconspirators planned the robbery of the

brothel apartment through the use of knives, force and violence.

b.   It was part of the conspiracy that defendant **CERROS-CRUZ** and

coconspirators intended to, through the use of knives and by actual and threatened physical

violence, sexually assault and forcibly rape females working within the brothel apartment and

unlawfully take proceeds of the prostitution business and money and personal property from persons within the brothel apartment.

c.   It was part of the conspiracy that defendant **CERROS-CRUZ** and coconspirators would tie and bind persons within the brothel apartment in order to unlawfully take proceeds of the prostitution business and money and personal property from persons within the brothel apartment.

d.   It was part of the conspiracy that the Defendant and his coconspirators would use severe violence, including murder, if persons within the brothel apartment resisted their demands.

Overt Acts

4.   In furtherance of the conspiracy, and to effect the illegal objects thereof, the Defendant and at least one coconspirator performed, participated in and did the following acts, among others, in the District of Maryland and elsewhere:

a.   On or about February 28, 2007, in Hyattsville, Maryland, defendant **CERROS-CRUZ** and at least one coconspirator, by means of actual and threatened violence, demanded money from persons within the brothel apartment.

b.   On or about February 28, 2007, in Hyattsville, Maryland, defendant **CERROS-CRUZ** and at least one coconspirator tied and bound Employee 1, who worked at the brothel apartment.

c.   On or about February 28, 2007, in Hyattsville, Maryland, defendant **CERROS-CRUZ** and at least one coconspirator searched the brothel apartment for money and items of value.

      d.   On or about February 28, 2007, in Hyattsville, Maryland, defendant **CERROS-CRUZ** and at least one coconspirator, through the use of threatened and actual force and violence, raped and sexually assaulted Employee 2, a person who worked at the brothel apartment, and unlawfully took personal property from the person and presence of Employee 2.

      e.   On or about February 28, 2007, in Hyattsville, Maryland, defendant **CERROS-CRUZ** and at least one coconspirator murdered C.C., a person who had arrived at the brothel apartment during the commission of the rape and robbery and had resisted their demands.

18 U.S.C. § 1951(a)

COUNT TWO

The Grand Jury for the District of Maryland further charges that:

1.   Paragraph 1, 3 and 4 of Count One of this Indictment are incorporated here.

2.   On or about February 28, 2007, in the District of Maryland and elsewhere, the

defendant,

RAMON MIGUEL CERROS-CRUZ,
a/k/a Ramon Miguel Cerros,
a/k/a Ramon Miguel Cerras,
a/k/a Miguel Ramon Cerras-Cruz

did knowingly and unlawfully obstruct, delay and affect and attempt to obstruct, delay and affect

commerce as that term is defined in Title 18, United States Code, Section 1951, by robbery as

that term is defined in Title 18, United states Code, Section 1951, in that the defendant did

unlawfully take and attempt to take money and personal property from the person and presence

of persons who worked and were present at the brothel apartment, against those persons' will by

means of actual and threatened force, violence, and fear of injury, immediate and future, to those

persons by threatening physical injury and death to said persons.

18 U.S.C. § 1951
18 U.S.C. § 2

Rod J. Rosenstein / WOM
Rod J. Rosenstein
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

Dated: February ___, 2012